

ATTACHMENT “B”-STATEMENT OF BASIS

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT PERMIT NO. F-01-022
CENTRIA
1099 HWY 421 SOUTH, FRANKFORT, KENTUCKY
JULY 11, 2001
FROUGH SHERWANI, REVIEWER
PLANT I.D. # 021-73-00041
APPLICATION LOG # 53922

SOURCE DESCRIPTION:

Centria is located at Frankfort, Kentucky, manufactures finished metal sliding panels, corner units and miscellaneous parts for building construction. Regulation 50: 031 has applied to the source. Now source has applied for Title V permit.

The source has one spray booth with two DeVilbiss air spray guns. The source has one air make up unit. Natural gas is used as fuel and natural gas as fuel. The source has 5 MIG welding machines. The source has roll forming and grinding section.

Emission Point	01	Spray Booth
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MP1	DeVilbiss air spray gun
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MP1:

This point is for spray gun. The "PTE" is based on 5.94 gallons per hour. The coating is mixed with MEK in the ratio of 50/50. The assumed transfer efficiency of the system is 55%. MEK or equivalent is used for clean up. The consumption of cleanup solvent is 0.5 gallons per hour. The "PTE" is based on 8760 hrs per year.

MP2	DeVilbiss air spray gun
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MP2:

This point is for spray gun. The "PTE" is based on 5.94 gallons per hour. The coating is mixed with MEK in the ratio of 50/50. The assumed transfer efficiency of the system is 55%. MEK or equivalent is used for clean up. The consumption of cleanup solvent is 0.5 gallons per hour. The "PTE" is based on 8760 hrs per year.

Emission Point	02	Welding
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This points is for MIG welding. There are 5 machines in the plant. The consumption of electrode is 1.108 lb. per hr per machine. This is an insignificant activity.

Emission Point 03 Air make Up Unit

This point is for air make up unit. Natural gas is used as fuel. There is one heater with the capacity of 2.0 mmBTU per hr each. This is an insignificant activity.

Emission Point 04 Grinding

This point is for grinding. This is an insignificant activity.

Emission Point 05 Roll Forming

This point is for roll forming. This is an insignificant activity.

COMMENTS:

Type of control and efficiency:

Emission point 01 has fabric filter to control particulate matter. The control efficiency of the filter is 90 %.

Emission factors and their source:

AP –42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

State regulation 401 KAR 52:030, 401 KAR 52:030. Federally-enforceable permits for non-major sources

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual emissions of HAPS for a single pollutant shall not exceed 9.0 tons per year. The combined emissions for HAPs shall not exceed 22.5 tons per year. The actual VOC emissions shall not exceed 90.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.